

**REMARKS**

Reconsideration of this Application is respectfully requested.

Claims 1-30, and 32-34 are pending in the application, with claims 1, 26, 27, 29 and 30 being the independent claims. Claims 1, 26, 27, 29 and 30 are amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above Amendment and the following Remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

***Interview***

Applicants thank Examiner Dastouri for the interview of October 27, 2005 in Examiner Rao's absence. Applicants' representatives demonstrated an original video sequence, and then its decomposition into an original camera-motion layer and a fixed-frame layer, editing the camera-motion layer, and recomposing the modified camera motion layer with the fixed frame layer. Claims 1 was discussed and compared to the Zhang reference. It was agreed that the Zhang reference did not teach, in particular, the camera-motion layer of claim 1, and that the rejection would be withdrawn if the claims were amended with a definition of "camera-motion layer."

***Rejections under 35 U.S.C. § 103***

In the Action on pages 2-14, section 4, claims 1-30 and 32-34 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2005/0031038 to Zhang et al. (hereinafter "Zhang"). Applicants respectfully traverse the rejection.

As amended, claim 1 recites a computer-readable medium having software for editing a decomposed original video sequence, said decomposed original video sequence comprising one or more original camera-motion layers that appear to move with a camera as the camera moves, and zero or more original fixed-frame layers decomposed from an original video sequence, said software comprising: code segments for editing at least one of said original camera-motion layers to obtain modified camera-motion layers such that each frame of a composite modified video sequence composed from said modified camera-motion layers and said original fixed-frame layers is obtained without editing each frame of said original video sequence, said editing comprising performing an

edge operation to one of said original camera-motion layers. Zhang fails to teach at least one element of claim 1.

Zhang fails to teach camera-motion layers. Instead, Zhang teaches motion images, which are a result of frame-by-frame analysis of moving pixels in a frame of a video sequence. See Zhang, paragraph 175. In contrast, a camera-motion layer of claim 1 is a layer of the video sequence that appears to move as the camera moves. See, e.g., paragraph 42. As agreed in the interview of October 27, 2005, Zhang does not teach camera-motion layers. Applicants respectfully request that the rejection be withdrawn and the claim be allowed.

Claims 2-25 depend from claim 1 and are allowable as being dependent from an allowable claim.

Claims 26, 27, 29 and 30 recite similar limitations as those recited in claim 1, and are allowable for at least the same reasons as those given above with respect to claim 1. Claim 28 depends from claim 27 and is allowable as being dependent from an allowable claim. Claims 32-34 depend from claim 30 and are allowable as being dependent from an allowable claim.

***Conclusion***

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Dated:

November 3, 2005

Respectfully submitted,

By  /   
Michael A. Sartori, Ph.D.

Registration No.: 41,289

Caroline J. Swindell

Registration No.: 56,784

VENABLE LLP

P.O. Box 34385

Washington, DC 20043-9998

(202) 344-4000

(202) 344-8300 (Fax)

Attorney/Agent For Applicant